

EXHIBIT 65

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE NATIONAL PRESCRIPTION OPIATE  
LITIGATION

MDL No. 2804

Case No. 17-md-2804

This document relates to:

Judge Dan

Aaron Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 17-OP-45005

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Videotaped Deposition of
TREVOR McALEER

January 10, 2019

9:06 a.m.

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Taken at:

Climaco, Wilcox, Peca & Garofoli  
55 Public Square, Suite 1950  
Cleveland, Ohio

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| <p style="text-align: right;">Page 82</p> <p>1 Q. Do you know if there was or if there has<br/>2 been another chairperson of the HR committee in your<br/>3 time as the legislative budget adviser?<br/>4 A. Yes.<br/>5 Q. And who was that chairperson?<br/>6 A. Councilwoman Yvonne Conwell.<br/>7 Q. And do you attend the HR committee<br/>8 meetings where these appointments are presented to<br/>9 the committee?<br/>10 A. Yes.<br/>11 Q. And what happens or can you walk me<br/>12 through the process of a hearing before the HR<br/>13 committee?<br/>14 A. Yes.<br/>15 Q. Would you please do that.<br/>16 A. Yes. The entire process includes the<br/>17 county executive will nominate an individual to a<br/>18 board. That then gets drafted into legislation, a<br/>19 resolution, that will be given to our clerk of<br/>20 council. Our clerk of council then will put that<br/>21 resolution on a Council agenda, a full Council<br/>22 agenda.<br/>23 That resolution then gets referred to a<br/>24 committee, which in this case is the HR committee.<br/>25 Then the HR committee will meet and have as many</p>                                                                         | <p style="text-align: right;">Page 84</p> <p>1 in the nomination process that you just described?<br/>2 A. Occasionally, yes.<br/>3 Q. And what are those responsibilities?<br/>4 A. I may have to speak at the HR committee<br/>5 meeting to answer a question by the committee, one<br/>6 of the committee members.<br/>7 Q. What types of questions does the council<br/>8 ask of you during these hearings?<br/>9 A. They tend to be high-level. It's not<br/>10 necessarily about the appointee but more about, say,<br/>11 a term, if it's a term, when did it become vacant,<br/>12 how many other seats might be vacant, things of that<br/>13 nature.<br/>14 Q. So you're not being asked to provide a<br/>15 recommendation one way or the other on whether a<br/>16 nominee should be approved by the Council; is that<br/>17 right?<br/>18 A. Not on executive-recommended appointments.<br/>19 Q. Okay. On non-executive-recommended<br/>20 appointments, is your role different? Do you -- is<br/>21 your role different?<br/>22 A. Yes.<br/>23 Q. And how is your role different for<br/>24 non-executive appointments?<br/>25 A. There are very few boards that Council</p> |
| <p style="text-align: right;">Page 83</p> <p>1 number of committee meetings that they need. And if<br/>2 it gets -- the HR committee will then vote on to<br/>3 refer that item back to the full council for<br/>4 consideration of the item.<br/>5 Q. And then when it gets to council, is there<br/>6 another hearing?<br/>7 A. There is a committee -- I'm sorry, a<br/>8 council meeting where then the full council would<br/>9 take action on that particular item.<br/>10 Q. And does the nominee for whichever board<br/>11 is currently being considered, does that person<br/>12 usually appear before the full council for an<br/>13 additional hearing?<br/>14 A. No, just at the HR committee typically.<br/>15 Q. Right. There are going to be differences,<br/>16 but in general that's the way it works?<br/>17 A. Correct.<br/>18 Q. And is the process you just described the<br/>19 way that the council has operated since you started<br/>20 as a legislative budget adviser in the summer of<br/>21 2011?<br/>22 A. Yes.<br/>23 Q. And throughout this process, aside from<br/>24 sometimes drafting the resolution for the<br/>25 appointments, do you have any other responsibilities</p> | <p style="text-align: right;">Page 85</p> <p>1 directly appoints versus confirming to certain<br/>2 boards, and I will handle that process along with<br/>3 co-workers of coming up with a recommendation to<br/>4 council members.<br/>5 Q. And which boards exist for the County for<br/>6 which the County Council appoints members as opposed<br/>7 to approving or confirming executive<br/>8 recommendations?<br/>9 A. I don't have an exhaustive list, but one<br/>10 is the Soldiers and Sailors Monument.<br/>11 Q. Can you think of any other examples?<br/>12 A. No.<br/>13 Q. Have you in your time as legislative<br/>14 budget adviser participated in communications with<br/>15 members of the County Council regarding specific<br/>16 appointees to the ADAMHS Board?<br/>17 MS. SACKS: Objection.<br/>18 THE WITNESS: Can you ask that one more<br/>19 time, please.<br/>20 BY MR. MOONEY:<br/>21 Q. Maybe. In your time as the legislative<br/>22 budget adviser, have you been a part of any<br/>23 conversations with members of the County Council<br/>24 regarding appointments to the ADAMHS Board?<br/>25 MS. SACKS: Same objection.</p>                          |

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| <p style="text-align: right;">Page 86</p> <p>1 THE WITNESS: Can you clarify what you</p> <p>2 mean by that question?</p> <p>3 BY MR. MOONEY:</p> <p>4 Q. Sure. So if the executive nominates Jane</p> <p>5 Smith to the ADAMHS Board, have you had any</p> <p>6 conversations with members of Council about whether</p> <p>7 Jane Smith should or should not be confirmed as a</p> <p>8 member of the ADAMHS Board?</p> <p>9 A. Not should or should not.</p> <p>10 Q. Have you had other conversations about</p> <p>11 specific nominees to the ADAMHS Board with members</p> <p>12 of council?</p> <p>13 MS. SACKS: Objection.</p> <p>14 THE WITNESS: Yes.</p> <p>15 BY MR. MOONEY:</p> <p>16 Q. What kinds of conversations have you had</p> <p>17 about nominees to the ADAMHS Board with members of</p> <p>18 the County Council?</p> <p>19 A. It could be questions around, if it's a</p> <p>20 reappointment for a particular individual, when was</p> <p>21 this person first appointed; does this person</p> <p>22 still -- I mean, is the person still working at X</p> <p>23 place just to see if that person's resumé is still</p> <p>24 up to date or things of that nature to get a</p> <p>25 background on that individual person.</p>               | <p style="text-align: right;">Page 88</p> <p>1 A. Yes.</p> <p>2 Q. Have you had any conversations with</p> <p>3 members of County Council about how they make that</p> <p>4 determination of whether or not to vote to approve a</p> <p>5 member or a nominee for the ADAMHS Board?</p> <p>6 MS. SACKS: Objection.</p> <p>7 THE WITNESS: I don't remember.</p> <p>8 BY MR. MOONEY:</p> <p>9 Q. If I wanted to know why a council member</p> <p>10 voted to approve an executive nominee to the ADAMHS</p> <p>11 Board, who would I speak to if you don't know?</p> <p>12 MS. SACKS: Objection.</p> <p>13 THE WITNESS: I don't know who you would</p> <p>14 speak to.</p> <p>15 BY MR. MOONEY:</p> <p>16 Q. Would Mr. Nanni know, the chief of staff?</p> <p>17 Yeah, would Mr. Nanni know?</p> <p>18 A. I don't know.</p> <p>19 MS. SACKS: Objection.</p> <p>20 BY MR. MOONEY:</p> <p>21 Q. Is there a member of the County Council</p> <p>22 staff with responsibility for assisting the council</p> <p>23 members with the nomination process, that is their</p> <p>24 overall responsibility as opposed to that's just</p> <p>25 part of yours?</p> |
| <p style="text-align: right;">Page 87</p> <p>1 Q. Do you know why members of Council vote to</p> <p>2 approve particular members of the ADAMHS Board?</p> <p>3 MS. SACKS: Objection.</p> <p>4 THE WITNESS: I don't know.</p> <p>5 BY MR. MOONEY:</p> <p>6 Q. Do you know what considerations go into</p> <p>7 members of Council's evaluation of whether or not an</p> <p>8 appointee should or should not be approved as a</p> <p>9 member of the ADAMHS Board?</p> <p>10 A. I don't know.</p> <p>11 Q. Have you had any conversations with</p> <p>12 members of Council about the criteria that they</p> <p>13 apply when evaluating whether or not to approve a</p> <p>14 nominee for a position as an ADAMHS Board member?</p> <p>15 A. Can you ask that --</p> <p>16 Q. I can try.</p> <p>17 Have you had any conversations with</p> <p>18 members of Council about the criteria that they</p> <p>19 apply when evaluating whether or not to approve a</p> <p>20 nominee to the ADAMHS Board?</p> <p>21 A. What do you mean by criteria?</p> <p>22 Q. So a nomination comes before the County</p> <p>23 Council, right, and they -- and the council member</p> <p>24 either says yes, this person should be appointed or</p> <p>25 approved or not, right?</p> | <p style="text-align: right;">Page 89</p> <p>1 MS. SACKS: Objection.</p> <p>2 THE WITNESS: There is for the nomination</p> <p>3 process.</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. Okay. And who is that person?</p> <p>6 A. It's the clerk who clerks the HR</p> <p>7 committee.</p> <p>8 Q. And is there a specific clerk for each of</p> <p>9 the committees?</p> <p>10 A. There is.</p> <p>11 Q. Okay. Do you have any role in drafting</p> <p>12 budget resolutions?</p> <p>13 A. Not original budget resolutions, not the</p> <p>14 introduced budget resolutions.</p> <p>15 Q. Okay. So it sounds like you're making a</p> <p>16 distinction between the original budget resolution</p> <p>17 and then something else.</p> <p>18 Is there a something else?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. What is -- what is that something</p> <p>21 else that you do have responsibility for?</p> <p>22 A. It would be budget amendments to a</p> <p>23 proposed budget resolution.</p> <p>24 Q. Let's start with the budget resolution</p> <p>25 itself, the original one.</p>                                                                              |

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| <p style="text-align: right;">Page 90</p> <p>1 Who has responsibility for drafting that</p> <p>2 resolution?</p> <p>3 A. I don't know who drafts the budget, the</p> <p>4 original budget resolution.</p> <p>5 Q. Is there a particular department in the</p> <p>6 executive's office that drafts the resolution?</p> <p>7 A. There's -- there's a particular department</p> <p>8 that's in charge of creating the contents of the</p> <p>9 resolution. I don't know who drafts it.</p> <p>10 Q. Okay. And who is the department in charge</p> <p>11 of creating the contents of the resolution?</p> <p>12 A. Office of Budget and Management.</p> <p>13 Q. And so OBM puts together the contents of a</p> <p>14 resolution, someone creates the resolution itself,</p> <p>15 and then it goes to the County Council; is that</p> <p>16 right?</p> <p>17 A. It eventually comes to the County Council.</p> <p>18 Q. Okay. And then there's a budget</p> <p>19 amendment. There's a budget amendment.</p> <p>20 What's that?</p> <p>21 A. So if there is the budget resolution</p> <p>22 that's introduced to the County Council, the County</p> <p>23 Council goes through the budget process, which can</p> <p>24 take up to anywhere between three months, up to</p> <p>25 three months; and council members have in the past</p> | <p style="text-align: right;">Page 92</p> <p>1 apprised of the budget process.</p> <p>2 What does that responsibility entail?</p> <p>3 A. So that includes ensuring that they have</p> <p>4 all the necessary information that we receive from</p> <p>5 the various directors, departments, and any other</p> <p>6 additional information that OBM might need to submit</p> <p>7 as supplemental material to the proposed budget</p> <p>8 resolution and ensuring that council members are</p> <p>9 receiving that information.</p> <p>10 Q. And so is it your role to sort of</p> <p>11 interface between the County Council and the</p> <p>12 executive's administration on matters relating to</p> <p>13 the budget?</p> <p>14 A. Yes.</p> <p>15 Q. Other than ensuring that the County</p> <p>16 Council has the information they need, are there</p> <p>17 other responsibilities that you have as the</p> <p>18 legislative budget adviser that sort of fall under</p> <p>19 the umbrella of keeping the Council apprised of the</p> <p>20 budget?</p> <p>21 A. Could you clarify that, what you mean by</p> <p>22 that?</p> <p>23 Q. Sure. I can try.</p> <p>24 So after the budget is passed, do you have</p> <p>25 any role in keeping the Council apprised of how the</p> |
| <p style="text-align: right;">Page 91</p> <p>1 amended the proposed budget.</p> <p>2 Q. And then so if a council member wants to</p> <p>3 amend the proposed budget, it would come to you to</p> <p>4 draft the amendment?</p> <p>5 A. Yes.</p> <p>6 Q. And is that amendment a separate</p> <p>7 resolution or something else?</p> <p>8 A. It could be -- it could be.</p> <p>9 Q. So it could be a separate resolution. And</p> <p>10 is the alternative that you would just enter into</p> <p>11 the Word document and change a number?</p> <p>12 A. No.</p> <p>13 Q. So what's the other way that there could</p> <p>14 be an amendment if not as a separate resolution?</p> <p>15 A. It could be an Excel spreadsheet with the</p> <p>16 proposed amendments that then the council would take</p> <p>17 action on those proposed amendments. It could be a</p> <p>18 writeup spelling out what the amendment would be,</p> <p>19 and they could adopt those amendments that way.</p> <p>20 Q. And for each of these options for the</p> <p>21 amendment, it would be your responsibility to create</p> <p>22 that document; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. You also mentioned that your</p> <p>25 responsibilities include keeping the County Council</p>                                                       | <p style="text-align: right;">Page 93</p> <p>1 executive is performing in relation to the approved</p> <p>2 budget?</p> <p>3 MS. SACKS: Objection.</p> <p>4 THE WITNESS: I don't know what you mean</p> <p>5 by "how the executive is performing."</p> <p>6 BY MR. MOONEY:</p> <p>7 Q. So the ADAMHS Board, I'm just using them</p> <p>8 as an example, the ADAMHS Board gets \$100,000, and</p> <p>9 they're supposed to be spending \$50,000 on</p> <p>10 personnel.</p> <p>11 Is it your responsibility to keep the</p> <p>12 council members apprised of whether or not the</p> <p>13 ADAMHS Board is spending money consistent with the</p> <p>14 money that was allocated in the budget or if they've</p> <p>15 gone over, they're actually going to spend \$55,000</p> <p>16 on personnel? Is that within your wheelhouse as the</p> <p>17 legislative budget adviser?</p> <p>18 A. There I think is a little misunderstanding</p> <p>19 on how the ADAMHS Board in particular is funding</p> <p>20 versus other agencies.</p> <p>21 Q. Okay. Pick a different one that's sort of</p> <p>22 more in line.</p> <p>23 A. So like an executive -- administrative</p> <p>24 department of development.</p> <p>25 Q. Sure, great.</p>                                             |

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| <p style="text-align: right;">Page 94</p> <p>1 A. We get monthly projections from the Office<br/>2 of Budget and Management on how they are performing.<br/>3 Q. And when you say "we," who do you mean by<br/>4 that?<br/>5 A. Typically it will come to me, and<br/>6 sometimes council members are on it. I will make<br/>7 sure council members have it from there if they're<br/>8 not on the notification.<br/>9 Q. Okay. And so once you've ensured that the<br/>10 council members have the monthly reports from the<br/>11 administrative agencies, do you communicate with the<br/>12 council members about those documents at all?<br/>13 A. Sometimes, yes.<br/>14 Q. Okay. And what kinds of conversations do<br/>15 you have with the members of Council about those<br/>16 monthly budget reports?<br/>17 A. It could vary from month to quarter in<br/>18 terms of if something sticks out from the report,<br/>19 just things that I want to make sure is on the<br/>20 council members' radar.<br/>21 Q. So is it correct that you review the<br/>22 reports to look for things that stick out?<br/>23 MS. SACKS: Objection.<br/>24 THE WITNESS: The monthly -- the monthly<br/>25 reports.</p> | <p style="text-align: right;">Page 96</p> <p>1 Q. You mentioned earlier that members will<br/>2 come to you or other members of the council staff<br/>3 with policy ideas; is that correct?<br/>4 A. Yes.<br/>5 Q. And they'll sometimes ask that the staff<br/>6 implement or draft legislation to implement those<br/>7 policy ideas?<br/>8 A. Yes.<br/>9 Q. In your time as the legislative budget<br/>10 adviser, has any member of the County Council come<br/>11 to you and asked for your assistance in drafting<br/>12 legislation to respond to prescription opioid abuse<br/>13 in Cuyahoga County?<br/>14 MS. SACKS: Objection.<br/>15 THE WITNESS: Can you ask that -- can you<br/>16 rephrase that question, please?<br/>17 BY MR. MOONEY:<br/>18 Q. Was there a particular part of the<br/>19 question that you found confusing?<br/>20 A. Because when I was talking about a policy<br/>21 getting drafted to legislation, I was referring to<br/>22 codified ordinances, and I don't believe that's what<br/>23 you're asking. I don't believe that's what you're<br/>24 seeking.<br/>25 Q. So okay. Are there any codified</p>                                                                                                          |
| <p style="text-align: right;">Page 95</p> <p>1 BY MR. MOONEY:<br/>2 Q. Okay.<br/>3 A. Or quarterly reports.<br/>4 Q. And what do you mean by things that stick<br/>5 out in those monthly or quarterly reports?<br/>6 A. An example of that could be if our sales<br/>7 tax revenue is down 3 percent from what was<br/>8 originally projected, that's a significant variance,<br/>9 is that going to be a trend or is that going to --<br/>10 is this a one-time problem, things like that.<br/>11 Q. So do you in your role as the legislative<br/>12 budget adviser work to create sort of trend reports<br/>13 that show the changes in sales tax over time?<br/>14 A. I track sales tax. I don't create. I<br/>15 don't create the reports that are sent to us.<br/>16 Q. Okay. And so if there were a report that<br/>17 tracked historical sales tax revenue, that would<br/>18 come from OBM?<br/>19 A. Historical sales tax, yes. I personally<br/>20 also as my duty keep track of monthly sales tax<br/>21 reports dating back for years.<br/>22 Q. But you don't create a separate document?<br/>23 A. I do not.<br/>24 Q. You just keep eyeballing it?<br/>25 A. Yes.</p>                            | <p style="text-align: right;">Page 97</p> <p>1 ordinances that you're aware of that were enacted by<br/>2 the County Council that relate to prescription<br/>3 opioid abuse?<br/>4 A. Not codified ordinances.<br/>5 Q. Are there resolutions that relate to<br/>6 prescription opioid abuse in Cuyahoga County that<br/>7 the County Council has enacted?<br/>8 A. There have been budget amendments to<br/>9 budgets related to the issue.<br/>10 Q. And when you say "related to the issue,"<br/>11 what do you mean by that?<br/>12 A. The ADAMHS Board as well as other<br/>13 departments have come to the County Council and have<br/>14 talked to us about increased areas where they're<br/>15 seeing that they would request additional resources<br/>16 to help combat the issue.<br/>17 Q. And when you say "the issue," what do you<br/>18 mean by that?<br/>19 A. They would talk about the -- they would<br/>20 use the terms "opiate crisis," "the prescription<br/>21 drug issue." They are the ones coming to us asking<br/>22 us for resources based on that.<br/>23 Q. When these departments or ADAMHS Board<br/>24 have come and asked for additional resources to<br/>25 combat the issue, have they also described the issue</p> |

25 (Pages 94 - 97)



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| <p style="text-align: right;">Page 98</p> <p>1 as one involving heroin abuse?</p> <p>2 MS. SACKS: Objection.</p> <p>3 THE WITNESS: I don't remember.</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. Has the issue that you mentioned, has that</p> <p>6 ever been described as a fentanyl issue?</p> <p>7 MS. SACKS: Objection.</p> <p>8 THE WITNESS: I don't know.</p> <p>9 BY MR. MOONEY:</p> <p>10 Q. What -- what resources have -- has the</p> <p>11 ADAMHS Board requested to respond or to combat the</p> <p>12 opiate crisis?</p> <p>13 MS. SACKS: Objection.</p> <p>14 THE WITNESS: Can you clarify what you</p> <p>15 mean by that?</p> <p>16 BY MR. MOONEY:</p> <p>17 Q. Sure. You said the budget -- the ADAMHS</p> <p>18 Board as well as other departments have come to the</p> <p>19 County Council and have talked about the increased</p> <p>20 areas where they're seeing that they would request</p> <p>21 additional resources to help combat the issue.</p> <p>22 Right?</p> <p>23 A. Yes.</p> <p>24 Q. And then I said what is the issue, and you</p> <p>25 said it's been described as an opiate crisis.</p>                                                                                                                                                                              | <p style="text-align: right;">Page 100</p> <p>1 hearings in the fall of 2017?</p> <p>2 MS. SACKS: Objection.</p> <p>3 THE WITNESS: I don't remember.</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. Okay. When was the -- what was the budget</p> <p>6 process that occurred before the fall of 2017?</p> <p>7 A. It would have been the fall of 2015 for</p> <p>8 the 2016-'17 biennial budget.</p> <p>9 Q. Okay. And did the ADAMHS Board come to</p> <p>10 the County Council asking for dollars for various</p> <p>11 programs seeking help and assistance from the County</p> <p>12 Council to increase their subsidy to respond to the</p> <p>13 opioid crisis in these fall of 2015 budget hearings?</p> <p>14 MS. SACKS: Objection.</p> <p>15 THE WITNESS: I don't know if it was</p> <p>16 during that budget hearing.</p> <p>17 BY MR. MOONEY:</p> <p>18 Q. Okay. Before the fall of 2015, when was</p> <p>19 the budget process before that?</p> <p>20 A. I don't have an exact date, but it would</p> <p>21 have -- if the biennial budget process was in place,</p> <p>22 because for a couple years we did single-year</p> <p>23 budgets, then we moved to a biennial budget process,</p> <p>24 if it was a biennial budget process, it would have</p> <p>25 been the fall of 2013.</p> |
| <p style="text-align: right;">Page 99</p> <p>1 So my question is, what resources has the</p> <p>2 ADAMHS Board requested of the County Council?</p> <p>3 A. So they have come to other -- they have</p> <p>4 come to us asking for millions of dollars for</p> <p>5 various programs seeking some help and assistance</p> <p>6 from the County Council to increase their subsidy.</p> <p>7 Q. And when did the ADAMHS Board come to the</p> <p>8 County Council asking for millions of dollars for</p> <p>9 various programs seeking some help and assistance</p> <p>10 from the County Council to increase their subsidy?</p> <p>11 A. They've come multiple times.</p> <p>12 Q. Okay.</p> <p>13 A. I don't have exact dates, but they've come</p> <p>14 multiple times.</p> <p>15 Q. Do they come as part of during the</p> <p>16 budgeting process?</p> <p>17 A. For the most part, they've come during the</p> <p>18 budget hearing process.</p> <p>19 Q. Okay. And so when was the most recent</p> <p>20 budget hearing process?</p> <p>21 A. It was the fall of 2017 for the 2018-'19</p> <p>22 biennial budget.</p> <p>23 Q. And the ADAMHS Board asked for money to</p> <p>24 increase the services they could provide to respond</p> <p>25 to the opiate crisis at this hearing -- these</p> | <p style="text-align: right;">Page 101</p> <p>1 Q. Even if it were an annual budget process,</p> <p>2 would there have been hearings in the fall of 2013?</p> <p>3 A. Similar time frame, yes.</p> <p>4 Q. So in the fall of 2013, did members of the</p> <p>5 ADAMHS Board come before County Council asking for</p> <p>6 money to increase the services they could provide to</p> <p>7 respond to the opiate crisis?</p> <p>8 MS. SACKS: Objection.</p> <p>9 THE WITNESS: I don't remember if it was</p> <p>10 the fall of 2013.</p> <p>11 BY MR. MOONEY:</p> <p>12 Q. Okay. So what kinds of services were --</p> <p>13 did the members of the ADAMHS Board who spoke to</p> <p>14 County Council say they wanted to provide to respond</p> <p>15 to the opiate crisis, if you know?</p> <p>16 MS. SACKS: Objection.</p> <p>17 THE WITNESS: I don't know specifically</p> <p>18 what type of services. I know that they would come</p> <p>19 asking for money.</p> <p>20 BY MR. MOONEY:</p> <p>21 Q. And as part of that process -- strike</p> <p>22 that.</p> <p>23 Understanding that you don't remember when</p> <p>24 these conversations occurred, is it your belief that</p> <p>25 the ADAMHS Board would have provided some kind of</p>                                          |

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| <p style="text-align: right;">Page 102</p> <p>1 information about the types of services they wanted<br/> 2 to provide to respond to the opiate crisis for which<br/> 3 they sought additional funding?<br/> 4 A. Yes, they would provide information.<br/> 5 Q. And when you say the ADAMHS Board was<br/> 6 requesting funding, was it funding specifically<br/> 7 related to the opiate crisis?<br/> 8 MS. SACKS: Objection.<br/> 9 THE WITNESS: It would be for mental<br/> 10 health services and addiction services.<br/> 11 BY MR. MOONEY:<br/> 12 Q. Which includes opiate addiction, right?<br/> 13 A. I don't know for sure.<br/> 14 Q. But it --<br/> 15 A. I mean, it --<br/> 16 Q. Probably?<br/> 17 A. It was listed in their services, but I<br/> 18 couldn't tell you what type of services.<br/> 19 Q. But there are services the ADAMHS Board<br/> 20 provides that are unrelated to opiate addiction?<br/> 21 MS. SACKS: Objection.<br/> 22 THE WITNESS: There are mental health<br/> 23 services and other services provided.<br/> 24 BY MR. MOONEY:<br/> 25 Q. And so when the ADAMHS Board asks for</p>                                                                                                                                                                | <p style="text-align: right;">Page 104</p> <p>1 Do you know whether in requesting<br/> 2 additional funding the ADAMHS Board distinguishes<br/> 3 between heroin abuse and prescription opioid abuse?<br/> 4 A. I don't know.<br/> 5 Q. All right. Turning to the department<br/> 6 directors asking for additional funding, which<br/> 7 departments have asked for additional funding of the<br/> 8 County Council to respond to the opioid issue?<br/> 9 A. So in terms of individual departments that<br/> 10 we've heard that is putting a strain on their<br/> 11 budgets include the Department of Children and<br/> 12 Family Services with the number of kids that are in<br/> 13 county custody because they -- the child, sometimes<br/> 14 babies, have lost one of their parents or both of<br/> 15 their parents to the issue.<br/> 16 They -- we have heard from our county<br/> 17 sheriff's department about the number of inmates<br/> 18 that are being taken into the jail custody. That<br/> 19 number of inmates has skyrocketed over the years.<br/> 20 We have heard from our Medical Examiner's<br/> 21 Office in terms of something as simple as the<br/> 22 increased number of transportation, body<br/> 23 transportation contract that they had to increase<br/> 24 because of this.<br/> 25 And we've heard from the MetroHealth</p> |
| <p style="text-align: right;">Page 103</p> <p>1 additional funding, do they -- did the members of<br/> 2 the ADAMHS Board identify how much of that<br/> 3 additional funding would go to opiate addiction as<br/> 4 opposed to some other purpose?<br/> 5 A. I don't remember.<br/> 6 Q. Is it your experience that when the ADAMHS<br/> 7 Board provides funding requests they would<br/> 8 distinguish between services for opiate addiction<br/> 9 versus other services the ADAMHS Board might<br/> 10 provide?<br/> 11 A. The ADAMHS Board would lay out pretty<br/> 12 detailed what their request for additional funding<br/> 13 would be for.<br/> 14 Q. Okay. Aside from the ADAMHS Board, which<br/> 15 other departments have come before the County<br/> 16 Council requesting additional resources to combat<br/> 17 the issue of prescription drug abuse?<br/> 18 A. So in terms of specific requests, I can't<br/> 19 specifically pinpoint to one request, but we've<br/> 20 heard from various department directors of the type<br/> 21 of challenges and issues and increased costs that<br/> 22 they're seeing within their departments because of<br/> 23 the issue.<br/> 24 Q. Okay. Before we go there, I want to<br/> 25 circle back on the ADAMHS Board piece.</p> | <p style="text-align: right;">Page 105</p> <p>1 Hospital just in terms of the Project DAWN and other<br/> 2 areas that they are using or that they have tried to<br/> 3 combat the issue.<br/> 4 Those are the specific examples that I can<br/> 5 recall right now.<br/> 6 Q. Okay. So we have Child and Family<br/> 7 Services, the sheriff's department, medical examiner<br/> 8 and MetroHealth, and then the ADAMHS Board?<br/> 9 A. And the ADAMHS Board, yes, sir.<br/> 10 Q. Are there any other departments sitting<br/> 11 here today that you can recall coming before the<br/> 12 County Council and requesting funding to respond to<br/> 13 the opioid issue?<br/> 14 A. Not that I can recall specifically that<br/> 15 have come and requested money to that, but I will<br/> 16 say that all of our departments at the County are<br/> 17 impacted in some form or fashion because we only<br/> 18 have so much money. We can't print money.<br/> 19 So if we do have to increase different<br/> 20 departments, that's got to come from somewhere.<br/> 21 Q. So when you say that all departments are<br/> 22 impacted in some form or fashion, are you -- you're<br/> 23 referring to there's a finite pot of money that the<br/> 24 county can allocate, and if you're spending money on<br/> 25 X you can't spend it on Y; is that right?</p> |



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| <p style="text-align: right;">Page 106</p> <p>1 A. Correct. There's only so much money.<br/> 2 Q. Okay. Are there any other impacts that<br/> 3 all of the departments are experiencing because of<br/> 4 the opioid crisis?<br/> 5 A. I will say I just thought of another<br/> 6 department based off your question would be child<br/> 7 support, where we have heard that the amount of<br/> 8 money that are being collected owed due to child<br/> 9 support has gone down because of the issue.<br/> 10 So now that doesn't financially impact the<br/> 11 county general fund or the Health and Human Services<br/> 12 levy, but that impacts other people who are<br/> 13 dependent on that type of money.<br/> 14 So that has -- that department has been<br/> 15 impacted as well.<br/> 16 Q. Okay. Do you know if the County is<br/> 17 seeking unpaid child support due to the opioid<br/> 18 crisis as part of this lawsuit?<br/> 19 MS. SACKS: Objection.<br/> 20 THE WITNESS: I don't know.<br/> 21 BY MR. MOONEY:<br/> 22 Q. Circling back to the Child and Family<br/> 23 Services department, let's start there, when did<br/> 24 Child and Family Services inform the County Council<br/> 25 that its costs were increasing because of increased</p> | <p style="text-align: right;">Page 108</p> <p>1 Q. Do you know if anyone on the County<br/> 2 Council has that information?<br/> 3 A. I don't know.<br/> 4 Q. Is there a particular committee of the<br/> 5 County Council that has responsibility or would have<br/> 6 heard this information from Child and Family<br/> 7 Services?<br/> 8 A. There is a Health and Human Services<br/> 9 committee, but as I previously talked about, the<br/> 10 monthly or quarterly reports, that is from a<br/> 11 budgetary perspective. And those reports provided<br/> 12 data of the average number of kids in custody.<br/> 13 So that would have been included in those<br/> 14 reports, and if you look over the years, you can see<br/> 15 an increase.<br/> 16 Q. Has any member of the County Council<br/> 17 received those reports from Child and Family<br/> 18 Services that show an increase in the number of<br/> 19 children in custody?<br/> 20 A. Those reports would have been initiated by<br/> 21 the Office of Budget and Management.<br/> 22 Q. And then provided to you?<br/> 23 A. Yes.<br/> 24 Q. And then you would have seen that the<br/> 25 members of County Council received that report?</p> |
| <p style="text-align: right;">Page 107</p> <p>1 numbers of kids in custody because of the opioid<br/> 2 crisis?<br/> 3 A. I can't give you an exact date. I don't<br/> 4 know the exact date.<br/> 5 Q. Was it part of the 2017 budget hearing<br/> 6 process?<br/> 7 A. I don't know.<br/> 8 Q. Was it part of the 2015 budget hearing<br/> 9 process?<br/> 10 A. I don't know.<br/> 11 Q. Was it part of the 2013 budget hearing<br/> 12 process?<br/> 13 A. I don't know.<br/> 14 Q. Okay. When the County -- when Child and<br/> 15 Family Services informed the County Council that it<br/> 16 was seeing an increase in the number of kids who<br/> 17 were in custody due to the opioid crisis, did the<br/> 18 individuals who provided that information<br/> 19 distinguish between overdoses of prescription<br/> 20 opioids and overdoses of heroin?<br/> 21 A. I don't know.<br/> 22 Q. Do you know, do you know what percentage<br/> 23 of children are in child custody now because of<br/> 24 issues related to prescription opioid abuse?<br/> 25 A. I don't know.</p>                                                                                                                                                                                   | <p style="text-align: right;">Page 109</p> <p>1 A. Yes.<br/> 2 Q. Has any member of County Council after<br/> 3 they received the report come back to you and asked<br/> 4 any questions about the report?<br/> 5 MS. SACKS: Objection.<br/> 6 THE WITNESS: Any questions about the<br/> 7 report? Is that what you're asking?<br/> 8 BY MR. MOONEY:<br/> 9 Q. About the reasons for the increase in the<br/> 10 number of children in custody.<br/> 11 A. I don't know about the reasons.<br/> 12 Q. Okay.<br/> 13 A. We've talked about the number of kids in<br/> 14 custody and what that does to, say, overtime and<br/> 15 things of that nature but not the specific reasons.<br/> 16 Q. Okay. Are there any other costs that the<br/> 17 Child and Family Services department has informed<br/> 18 you or members of Council that have increased<br/> 19 because of the opioid crisis in Cuyahoga County?<br/> 20 A. Except for the overtime, I mean --<br/> 21 Q. So the overtime and the number of children<br/> 22 in custody have increased the costs to Child and<br/> 23 Family Services?<br/> 24 A. I don't recall any other.<br/> 25 Q. Okay. And when the information -- when --</p>                 |

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| <p style="text-align: right;">Page 110</p> <p>1 do you have an understanding of how much of that<br/>2 overtime increase is due to prescription opioid<br/>3 abuse as compared to heroin abuse?<br/>4 A. I don't know.<br/>5 Q. When Child and Family Services asked for<br/>6 additional funding to respond to the opioid issues<br/>7 the County faces, did the County Council approve<br/>8 that funding?<br/>9 MS. SACKS: Objection.<br/>10 THE WITNESS: It wasn't -- just going back<br/>11 to the process where the administration provides a<br/>12 recommended budget. There have been times<br/>13 throughout the budget process where County Council<br/>14 has during the budget hearings increased DCFS's<br/>15 budget.<br/>16 BY MR. MOONEY:<br/>17 Q. Okay. Above what the executive's<br/>18 recommended budget was?<br/>19 A. Yes.<br/>20 Q. And the reason -- and did the members of<br/>21 the County Council explain why they were increasing<br/>22 the Child and Family Services budget above what was<br/>23 requested from the county executive?<br/>24 A. One particular example is increase -- they<br/>25 increased the number of social workers because the</p> | <p style="text-align: right;">Page 112</p> <p>1 amount that CFS would receive?<br/>2 A. I don't have that number.<br/>3 Q. You mentioned that the sheriff's<br/>4 department has asked for additional funding of the<br/>5 County Council because of the number of inmates that<br/>6 have -- in custody that have I believe you used the<br/>7 word "skyrocketed" over the years; is that right?<br/>8 A. That is correct.<br/>9 Q. Okay. And when you say the number of<br/>10 inmates in custody has skyrocketed, that's because<br/>11 of prescription opioid abuse?<br/>12 A. I don't know.<br/>13 Q. Okay. It's just that there are more<br/>14 people going to jail now than there were at some<br/>15 point in the past?<br/>16 A. There are more inmates in custody at the<br/>17 Cuyahoga County Sheriff's Office.<br/>18 Q. And when did the sheriff's department<br/>19 inform the Cuyahoga County Council that it needed<br/>20 additional funding to respond to the increase in the<br/>21 number of inmates in custody?<br/>22 A. Similar to DCFS, typically on the monthly<br/>23 or quarterly OBM reports that we receive, it also<br/>24 tracks the average daily population over time. And<br/>25 it's been an increasing issue with the number of</p> |
| <p style="text-align: right;">Page 111</p> <p>1 caseload sizes for the social workers were<br/>2 unmanageable.<br/>3 Q. And as part of that -- sorry.<br/>4 When did that increased number of social<br/>5 workers occur?<br/>6 A. I don't have the exact budget time frame.<br/>7 Q. Sure. And was part of the reason that the<br/>8 number of social workers was so low because Child<br/>9 and Family Services had to reduce the number of<br/>10 social workers it had as a result of the economic<br/>11 recession in 2008?<br/>12 MS. SACKS: Objection.<br/>13 THE WITNESS: I don't know.<br/>14 BY MR. MOONEY:<br/>15 Q. Was there any explanation provided by the<br/>16 members of Child and Family Services that they were<br/>17 understaffed because of a large reduction in force<br/>18 arising out of the economic conditions of The Great<br/>19 Recession?<br/>20 MS. SACKS: Objection.<br/>21 THE WITNESS: I don't know.<br/>22 BY MR. MOONEY:<br/>23 Q. Do you know how many social workers were<br/>24 employed by Child and Family Services before the<br/>25 County Council amended the budget to increase the</p>                                                    | <p style="text-align: right;">Page 113</p> <p>1 inmates per year on average that are there every<br/>2 day. It's gone up year over year.<br/>3 So you can see correlation, again similar<br/>4 to DCFS, overtime increased costs because of the<br/>5 number of inmates that are there and number of staff<br/>6 you need there, and you can see that number going up<br/>7 over the same time frame of the number of children<br/>8 have gone up for DCFS.<br/>9 Q. And does the monthly reports that you're<br/>10 referring to distinguish between inmates that are in<br/>11 custody because of prescription opioid abuse as<br/>12 opposed to some other reason?<br/>13 A. No.<br/>14 Q. Do you know which -- how -- what<br/>15 percentage of the inmates in custody of the<br/>16 sheriff's department are there as a result of opioid<br/>17 abuse?<br/>18 A. I don't know.<br/>19 Q. How about of heroin abuse?<br/>20 A. I don't know.<br/>21 Q. For people who have been arrested for<br/>22 possession of heroin?<br/>23 A. I don't know.<br/>24 Q. People who have been arrested for<br/>25 possession of prescription opioids?</p>                                                                                                                          |

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| <p style="text-align: right;">Page 114</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. Is that information that's provided</p> <p>3 to members of County Council --</p> <p>4 MS. SACKS: Objection.</p> <p>5 BY MR. MOONEY:</p> <p>6 Q. -- to your knowledge?</p> <p>7 A. I don't know.</p> <p>8 Q. And when did the sheriff's department</p> <p>9 request additional funding from the County Council</p> <p>10 because of inmate increases in their custody?</p> <p>11 A. It could either be increasing money mainly</p> <p>12 because of overtime or if other departments had to</p> <p>13 go through budget reductions where they could not</p> <p>14 take -- similar to DCFS, where they could not absorb</p> <p>15 a budget reduction.</p> <p>16 So other departments might have gotten</p> <p>17 reduced, not necessarily the sheriff might have seen</p> <p>18 more money, but we were unable to reduce their</p> <p>19 budget because of the issue. And that has happened</p> <p>20 over the same time frame as DCFS. Over the last</p> <p>21 budgets we were unable to do that.</p> <p>22 Q. Sure. So in the fall of 2017, did this</p> <p>23 issue arise of the sheriff having an increased</p> <p>24 number of inmates due to or in their custody?</p> <p>25 MS. SACKS: Objection.</p> | <p style="text-align: right;">Page 116</p> <p>1 we've sort of been using the terminology "additional</p> <p>2 funding," but then you mentioned that the sheriff's</p> <p>3 department may not have seen additional funding. It</p> <p>4 may have actually just seen a level budget while</p> <p>5 other budgets had to be decreased because, in your</p> <p>6 understanding, there's a finite amount of money, and</p> <p>7 the revenue might have been low, and so the</p> <p>8 sheriff's department got to keep everything, but</p> <p>9 other people saw reductions; is that right?</p> <p>10 A. Correct.</p> <p>11 Q. So my question is, when describing the</p> <p>12 Child and Family Services request for funding, were</p> <p>13 they requesting additional funding, or was it a</p> <p>14 request to remain level?</p> <p>15 A. In the social worker example that I said</p> <p>16 where council members provided additional social</p> <p>17 workers, that's something that was done after the</p> <p>18 resolution was introduced.</p> <p>19 Q. Okay. Are there other examples that you</p> <p>20 can think of in the Child and Family Services budget</p> <p>21 where after the OBM resolution was introduced the</p> <p>22 council determined that it would amend the</p> <p>23 resolution to add additional funding to respond to</p> <p>24 the prescription opioid issue in Cuyahoga County?</p> <p>25 A. On top of the social workers, it related</p> |
| <p style="text-align: right;">Page 115</p> <p>1 THE WITNESS: I don't know.</p> <p>2 BY MR. MOONEY:</p> <p>3 Q. How about in the fall of 2015 during that</p> <p>4 budgeting process, did the sheriff's department</p> <p>5 request funding to respond to the increase in the</p> <p>6 number of inmates in their custody?</p> <p>7 A. I don't know.</p> <p>8 Q. What about in the fall of 2013 during that</p> <p>9 budgeting process, did the sheriff's department</p> <p>10 request additional funding for responding to the</p> <p>11 increase in the number of inmates in their custody?</p> <p>12 A. I don't know.</p> <p>13 Q. And just to make sure that you and I are</p> <p>14 on the same page in how we're describing this of</p> <p>15 increased resources, is it that the executive has</p> <p>16 recommended that the budgets be increased, or is it</p> <p>17 that the Council is considering amending the</p> <p>18 recommended budget to add additional funds on top of</p> <p>19 what the budget -- the recommended budget already</p> <p>20 has in it?</p> <p>21 MS. SACKS: Objection.</p> <p>22 THE WITNESS: What do you mean in terms</p> <p>23 of -- because can you --</p> <p>24 BY MR. MOONEY:</p> <p>25 Q. Yes. I realized while you were talking</p>               | <p style="text-align: right;">Page 117</p> <p>1 to originally when one budget was introduced there</p> <p>2 was a belief that over time it could be reduced, so</p> <p>3 that was a budget reduction. During the budget</p> <p>4 hearings, I think they, they collectively, it wasn't</p> <p>5 just Council but Council had to amend the budget,</p> <p>6 but the overtime goals that were in the proposed</p> <p>7 budget wouldn't be met, couldn't be met, the</p> <p>8 reduction. So there had to be an increase there as</p> <p>9 well.</p> <p>10 Q. Okay. When OBM provides the budget to you</p> <p>11 and then it gets to the Council, do you have any</p> <p>12 input in the development of the OBM budget?</p> <p>13 A. You're talking about the biennial budget?</p> <p>14 Q. Yes. Or does it just sort of come to you</p> <p>15 as a finished product that gets the council members</p> <p>16 involved and the process going?</p> <p>17 A. In most cases, prior to introduction there</p> <p>18 are some discussions going back and forth about what</p> <p>19 is going to be introduced.</p> <p>20 Q. And what are those discussions or what do</p> <p>21 those discussions entail?</p> <p>22 A. Particularly focused on if there are</p> <p>23 reductions in departments' budgets, more as an FYI,</p> <p>24 or here is a program that we haven't funded before</p> <p>25 that we would like to fund, a new initiative or</p>                            |

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| <p style="text-align: right;">Page 118</p> <p>1 program. That would be included in the budget.</p> <p>2 Q. So are these more informational meetings</p> <p>3 so that you know what's coming down the pike for the</p> <p>4 members of Council?</p> <p>5 A. Yes.</p> <p>6 Q. Do you have any role in determining how</p> <p>7 much money the executive's budget will recommend for</p> <p>8 any particular department in the Cuyahoga County</p> <p>9 government?</p> <p>10 A. Not in the recommendation.</p> <p>11 Q. The way you answered that makes me think</p> <p>12 you might play a role in some other part of the</p> <p>13 budgeting process in recommending how much</p> <p>14 departments receive.</p> <p>15 Is that true?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What role do you play in that</p> <p>18 process?</p> <p>19 A. That would be during the budget amendment</p> <p>20 process where Council, as we talked about, would</p> <p>21 make amendments to the budget.</p> <p>22 Q. Okay. And what is your involvement in</p> <p>23 that process?</p> <p>24 A. I would help assist in creating the budget</p> <p>25 amendments for the council members, working with OBM</p>                   | <p style="text-align: right;">Page 120</p> <p>1 Is that right?</p> <p>2 A. No.</p> <p>3 Q. No, okay. Where am I wrong about that?</p> <p>4 A. The biennial budget goes to the Committee</p> <p>5 of the Whole, so that is an example.</p> <p>6 Q. And what's the Committee of the Whole?</p> <p>7 A. It's all 11 members that meet. It's not a</p> <p>8 council meeting, so they can't officially approve</p> <p>9 anything or adopt anything out of the Committee of</p> <p>10 the Whole. They still have to refer it out of</p> <p>11 Committee of the Whole to the full council.</p> <p>12 So the biennial process happens during the</p> <p>13 Committee of the Whole process.</p> <p>14 Q. I see. Is there -- who's the chair of the</p> <p>15 Committee of the Whole?</p> <p>16 A. For most Committee of the Wholes it's the</p> <p>17 council president, but for the budget process the</p> <p>18 chair of the finance committee will chair the</p> <p>19 Committee of the Whole.</p> <p>20 Q. Okay. So for the budget processes, at</p> <p>21 least as long as Dale Miller has been the chair of</p> <p>22 the Department of Finance, he has been the chair for</p> <p>23 the budget process, right?</p> <p>24 A. Of the Committee of the Whole, yes.</p> <p>25 Q. Okay. And so who was the chair of the</p> |
| <p style="text-align: right;">Page 119</p> <p>1 to -- kind of reverse of giving them a heads up that</p> <p>2 this is what Council is going to do during the</p> <p>3 amendment process, during those budget hearings.</p> <p>4 Q. And do you provide recommendations to</p> <p>5 members of Council regarding whether -- whether or</p> <p>6 not a request for funding should or should not be</p> <p>7 approved?</p> <p>8 A. They ask me my opinion.</p> <p>9 Q. Are there particular members of the County</p> <p>10 Council who ask your opinion more frequently than</p> <p>11 others?</p> <p>12 A. On budget amendments?</p> <p>13 Q. On budget amendment issues, yes.</p> <p>14 A. It's a tough question to answer because it</p> <p>15 happens every two years.</p> <p>16 Q. Okay. Are there particular members of</p> <p>17 County Council who are more involved in the budget</p> <p>18 process than others?</p> <p>19 MS. SACKS: Objection.</p> <p>20 THE WITNESS: What do you mean "more</p> <p>21 involved"?</p> <p>22 BY MR. MOONEY:</p> <p>23 Q. So I assume that the department or the</p> <p>24 committee of finance has overall responsibility as a</p> <p>25 committee for the budget.</p> | <p style="text-align: right;">Page 121</p> <p>1 finance department or finance division -- finance</p> <p>2 committee of the County Council before Council</p> <p>3 Member Miller?</p> <p>4 A. What time frame?</p> <p>5 Q. Just before.</p> <p>6 A. Immediately before?</p> <p>7 Q. Sure.</p> <p>8 A. Dave Greenspan.</p> <p>9 Q. And before Mr. Greenspan?</p> <p>10 A. Dale Miller.</p> <p>11 Q. Okay. So it went Miller, Greenspan,</p> <p>12 Miller?</p> <p>13 A. Miller back, yes.</p> <p>14 Q. Before Miller, was there a different</p> <p>15 chair?</p> <p>16 A. He was the first chair of the finance</p> <p>17 committee.</p> <p>18 Q. I see. And have you provided a</p> <p>19 recommendation to members of the County Council</p> <p>20 regarding whether additional funding should be</p> <p>21 provided to address Cuyahoga's opioid addiction</p> <p>22 issues?</p> <p>23 A. I discussed with the council members the</p> <p>24 request for additional social workers, the restoring</p> <p>25 of the funds for the overtime.</p>                                                                                                                                                                                                                                                                      |

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| <p style="text-align: right;">Page 122</p> <p>1 Q. Anything else?</p> <p>2 A. I've discussed that -- the inability to</p> <p>3 reduce the sheriff's budget because of the overtime</p> <p>4 issue.</p> <p>5 Q. Anything else?</p> <p>6 A. I've discussed the -- we haven't talked</p> <p>7 about the funding provided for first responders for</p> <p>8 the naloxone, I believe.</p> <p>9 Q. Is that -- is that first responders</p> <p>10 related to MetroHealth funding?</p> <p>11 A. Part of -- they were involved in the</p> <p>12 project, but we also wanted to make available to</p> <p>13 various cities and stuff some funding through -- we</p> <p>14 have public safety grants that that money could be</p> <p>15 used for that purpose.</p> <p>16 Q. I see.</p> <p>17 A. In addition, we discussed -- we increased</p> <p>18 the ADAMHS Board subsidy.</p> <p>19 Q. You -- the ADAMHS Board is funded by the</p> <p>20 Health and Human Services levy, right?</p> <p>21 A. Partially funded by the Health and Human</p> <p>22 Services levy.</p> <p>23 Q. What other part is the ADAMHS Board</p> <p>24 funded?</p> <p>25 A. They get money that directly. They get</p>                                                            | <p style="text-align: right;">Page 124</p> <p>1 in body transportation costs related to the opioid</p> <p>2 issues in Cuyahoga County; is that right?</p> <p>3 A. Yes.</p> <p>4 Q. Did that request come in the fall of 2017</p> <p>5 as part of the budget process?</p> <p>6 A. It came -- that particular request came as</p> <p>7 a contract amendment to the Board of Control.</p> <p>8 Q. I see. And when did it come before the</p> <p>9 Board of Control as a contract amendment?</p> <p>10 A. I don't have the exact date.</p> <p>11 Q. Was it within the last four years?</p> <p>12 A. I can't say for certain.</p> <p>13 Q. For the MetroHealth request for funding,</p> <p>14 is it your understanding that Cuyahoga County</p> <p>15 provides funding to operate the Project DAWN</p> <p>16 program?</p> <p>17 A. Partially, it's my understanding.</p> <p>18 Q. And do you know when the Project DAWN --</p> <p>19 when Project DAWN began in Cuyahoga County?</p> <p>20 A. I do not.</p> <p>21 Q. Does March of 2013 sound right for when</p> <p>22 Project DAWN began?</p> <p>23 A. I don't know.</p> <p>24 Q. And Project DAWN is the naloxone program?</p> <p>25 A. Yes.</p>                                                                             |
| <p style="text-align: right;">Page 123</p> <p>1 money from the State of Ohio. I don't know the</p> <p>2 particulars.</p> <p>3 Q. Okay. So as far as Cuyahoga County's</p> <p>4 funding of the ADAMHS Board is concerned, it's</p> <p>5 coming from the HHS levy?</p> <p>6 A. Yes. There is I would say an asterisk to</p> <p>7 that though. I believe the Court of Common Pleas</p> <p>8 has contracts with the ADAMHS Board. They might</p> <p>9 not -- that portion of that contract might not be</p> <p>10 funded from the Health and Human Services levy, but</p> <p>11 those are small amounts compared to the full</p> <p>12 subsidy.</p> <p>13 Q. Okay. And the HHS levy is -- that's a tax</p> <p>14 on Cuyahoga County properties; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. And that HHS levy is approved by the</p> <p>17 citizens of the county as a part of a ballot</p> <p>18 process?</p> <p>19 A. Ballot initiative.</p> <p>20 Q. And does the -- does the HHS levy only</p> <p>21 fund the ADAMHS Board, or does it fund other things</p> <p>22 as well?</p> <p>23 A. It funds other things as well.</p> <p>24 Q. You mentioned the Medical Examiner's</p> <p>25 Office also requested funding because of an increase</p> | <p style="text-align: right;">Page 125</p> <p>1 Q. Makes naloxone available to people who</p> <p>2 have overdosed from prescription opioids or heroin?</p> <p>3 A. That's my understanding of Project DAWN.</p> <p>4 Q. Other than the Child and Family Services,</p> <p>5 sheriff department, medical examiner, MetroHealth</p> <p>6 and ADAMHS Board, are there any other departments of</p> <p>7 the government that have come before the County</p> <p>8 Council and requested funding to respond to the</p> <p>9 opioid crisis in Cuyahoga County?</p> <p>10 A. Not that I can remember at this time.</p> <p>11 Q. Okay. When you became the legislative</p> <p>12 budget adviser, were you required to take any sort</p> <p>13 of oath?</p> <p>14 A. No.</p> <p>15 Q. Okay. You're not like a member of</p> <p>16 Congress where you have to swear to uphold the laws</p> <p>17 of the Constitution?</p> <p>18 A. Some department directors at the County</p> <p>19 have to do that.</p> <p>20 Q. Okay. But you're not one of them --</p> <p>21 A. No.</p> <p>22 Q. -- as a staff member of the Council?</p> <p>23 A. As a staff member of Council.</p> <p>24 Q. Do you consider yourself to have any</p> <p>25 duties to the residents of Cuyahoga County as a</p> |



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| <p style="text-align: right;">Page 126</p> <p>1 legislative budget adviser?</p> <p>2 MS. SACKS: Objection.</p> <p>3 THE WITNESS: Can you describe a little</p> <p>4 further what you mean by that?</p> <p>5 BY MR. MOONEY:</p> <p>6 Q. Sure. Do you consider it your</p> <p>7 responsibility to ensure that funds are allocated</p> <p>8 responsibly among the various parts of the Cuyahoga</p> <p>9 County government?</p> <p>10 MS. SACKS: Objection.</p> <p>11 THE WITNESS: I think as a public servant,</p> <p>12 someone who is funded from the taxpayer money, yes.</p> <p>13 BY MR. MOONEY:</p> <p>14 Q. Okay. And does your -- do you consider</p> <p>15 your role as the legislative budget adviser as also</p> <p>16 including a responsibility that County Council has</p> <p>17 accurate information regarding the budgets that it</p> <p>18 ultimately passes into law?</p> <p>19 A. Yes. I believe that is one of my main</p> <p>20 responsibilities, to ensure council members are</p> <p>21 informed accurately.</p> <p>22 Q. And do you consider your responsibility as</p> <p>23 a legislative budget adviser to understand the</p> <p>24 County's overall economic outlook in order to inform</p> <p>25 council members of the budgeting process?</p> | <p style="text-align: right;">Page 128</p> <p>1 collections, right?</p> <p>2 A. Yes.</p> <p>3 Q. My understanding is that the property</p> <p>4 taxes are collected by the state, right?</p> <p>5 A. No.</p> <p>6 Q. No, okay. How am I wrong?</p> <p>7 A. The property tax -- the property taxes is</p> <p>8 collected directly from the County.</p> <p>9 Q. Okay.</p> <p>10 A. So residents will send money directly to</p> <p>11 the County.</p> <p>12 Q. Okay. And as a legislative budget</p> <p>13 adviser, do you watch for trends or -- I'm</p> <p>14 forgetting the words you used to describe it, but</p> <p>15 basically events that you think should be raised</p> <p>16 with the members of the Council regarding the</p> <p>17 County's property tax collection?</p> <p>18 A. I -- yes, I keep that on my radar.</p> <p>19 Q. And is it your understanding or do you</p> <p>20 have an understanding of whether property values in</p> <p>21 Cuyahoga County declined as part of the assessment</p> <p>22 process in 2011?</p> <p>23 A. I can't speak to the reappraisal process</p> <p>24 in 2011.</p> <p>25 Q. Okay. Do you -- does anyone report to you</p>                                                                                                                                      |
| <p style="text-align: right;">Page 127</p> <p>1 MS. SACKS: Objection.</p> <p>2 THE WITNESS: Can you rephrase that,</p> <p>3 please?</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. So you mentioned earlier that one of the</p> <p>6 things that you keep an eye on is the sales tax</p> <p>7 collections.</p> <p>8 Is it your -- do you believe it's one of</p> <p>9 your responsibilities to understand the sort of</p> <p>10 external economic factors that impact the revenue</p> <p>11 that is available to the County's government?</p> <p>12 MS. SACKS: Objection.</p> <p>13 THE WITNESS: I don't believe it is my</p> <p>14 direct responsibility. We defer to OBM for that</p> <p>15 information, but I like to have a knowledge of like,</p> <p>16 example, the sales tax.</p> <p>17 BY MR. MOONEY:</p> <p>18 Q. Do you keep an eye on the property tax</p> <p>19 collections that are -- that go into the County's</p> <p>20 revenue stream?</p> <p>21 MS. SACKS: Objection.</p> <p>22 THE WITNESS: What do you mean "keep an</p> <p>23 eye on"?</p> <p>24 BY MR. MOONEY:</p> <p>25 Q. So you follow trends in sales tax</p>                                                                                                                                              | <p style="text-align: right;">Page 129</p> <p>1 as the legislative budget adviser? Do you have a</p> <p>2 staff?</p> <p>3 A. I do not have a staff --</p> <p>4 Q. Do you --</p> <p>5 A. -- that directly report to me.</p> <p>6 Q. Okay. Do you report to -- do you report</p> <p>7 to someone?</p> <p>8 A. I report directly to our chief of staff,</p> <p>9 Joseph Nanni, but the staff do work for all 11</p> <p>10 council members. But we all directly report to our</p> <p>11 chief of staff, Joe Nanni.</p> <p>12 Q. And what are Mr. Nanni's duties, as you</p> <p>13 understand them?</p> <p>14 A. He's the chief of staff, so I kind of will</p> <p>15 leave it there. I mean, he's just -- he's</p> <p>16 responsible for the staff, ensuring staff is meeting</p> <p>17 the, you know, requests and needs of the council</p> <p>18 members and things of that nature.</p> <p>19 Q. Okay. What is the -- and then what is the</p> <p>20 role of the clerk of council, as you understand it?</p> <p>21 A. The clerk of council, she has two staff</p> <p>22 members, so there's a total of three clerks. They</p> <p>23 are there to manage the agenda, the minutes, the</p> <p>24 records for all the committee members -- I'm sorry,</p> <p>25 committees, not committee members, but the council</p> |